

EXHIBIT A-2

November 21, 2002

W.R. Grace

Page 42
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/09/02	DRD	Review, categorize and code documents produced by EPA for relevance to various case issues.	8.00	480.00
10/09/02	ICM	Conduct case law research for Motion in Opposition to Exclude the Expert Testimony of Dale Jensen and Motion in Opposition to Summary Judgement (1.70); conduct case law research and research citations to support specific fact statements in Statement of Material Facts re Cost recovery (1.30).	3.00	330.00
10/10/02	LB	Conference with CLNeitzel re elements of proof and administrative record exceptions remedy at trial v. discovery (.30); conference with KJCoggon re Grace discovery responses and whether any need supplementation and plan re same (.20); review memoranda and briefs re standard of proof, exceptions to administrative record review (1.40); continue work analyzing elements of proof (.50); meeting with KJCoggon, JDMcCarthy, CLNeitzel, et al. re pretrial deadlines and tasks (1.00); review draft time line and e-mail comments to Karen Kinnear re same (.30); telephone conference with CGHarris re reply re Weis and Peronard deposition limits (.10); telephone conference with KJCoggon re Dan Thornton admissions at asbestos conference (.10); review January and February 2000 CAG minutes for trial preparation and assign tasks re time line re same to Karen Kinnear (.30); travel from Denver to Kalispell for interview of Jim Stout and Alan Stringer re trial preparation and for site visit (3.00) (N/C 3.00) (NWT 50%).	7.20	2,880.00
10/10/02	KWL	Review EPA production documents re Max Dodson for purposes of identifying trial exhibits (1.80); telephone conference with Bill Corcoran re trial strategy issues (.20).	2.00	700.00
10/10/02	JDM	Review depositions and documents for findings of facts (0.5); conference with cost recovery team (1.00); meet with JAHall re ATSDR conclusions of law (0.3).	1.80	540.00

November 21, 2002

W.R. Grace

Page 43
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/10/02	CLN	Review of Hughson deposition transcript and memo to file re testimony (1.80); attend internal meeting re Grace trial strategy and coordination of work assignments (1.00); memorandum to file re Hughson deposition (.50); review of Quivik motion (.20); conference with D. Kuchinsky re deposition transcripts (.30); review of Eschenbach transcript to prepare to discuss with D. Kuchinsky and memo to file re Eschenbach deposition (3.10); conference with LBrown re finding of fact (.90); review of liabilities summary judgment motion (.30).	8.10	2,430.00
10/10/02	LSD	Review motion for summary judgment on liability issues received from DOJ, draft e-mail re preliminary thoughts and research issues on same (2.30).	2.30	690.00
10/10/02	KJC	Address inquiries and issues re document databases (0.30); review and respond to e-mail and questions re document review and coding (2.20); coordinate expert work including review and respond to e-mail and messages and telephone conferences with experts and counsel (0.60); review and respond to e-mail and follow up on document production from EPA (0.40); conference with cost recovery team (1.00); conferences with JLSherman, ATCrist, and NKAberle re outstanding discovery issues and privilege logs (1.30); telephone conferences with WBrown re schedule, deadlines, trial support and database issues (1.30); telephone conference with A. Stringer re schedule and trial (0.20); telephone conference with W. Sparks re J. Wolter and other witnesses (0.20); conferences with LBrown re discovery responses, trial strategies, logistics and new information re EPA (0.20); research re EPA HQ involvement (1.80); review and forward Motion for Summary Judgment for preparation of response (1.30); draft letter to H. Kukis re outstanding discovery (1.10); telephone conference with EESTevenson re outstanding discovery (0.40); telephone conference with J. Freeman re discovery issues and motions (0.40).	12.70	3,492.50

November 21, 2002

W.R. Grace

Page 44
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/10/02	JD	Review documents for responsiveness to discovery requests and privilege (1.50).	1.50	390.00
10/10/02	EES	Trial team strategy meeting for purposes of coordinating work assignments (1.00); review Wiley Wright deposition testimony (3.90); extensive telephone conference with accounting expert re Wiley Wright documentation and expert report issues (1.40); draft proposed findings of fact (2.80).	9.10	2,548.00
10/10/02	CCC	Review, categorize and code documents produced by EPA for relevance to various case issues.	10.00	2,600.00
10/10/02	GMB	Lexis research re removal action/remedial action distinction; review cases (2.00); review cases re removal action/remedial action distinction (1.80).	3.80	836.00
10/10/02	LAC	Review, categorize and code documents produced by EPA for relevance to various case issues.	3.10	697.50
10/10/02	SCC	Review documents for responsiveness to discovery requests and privilege (0.60).	0.60	141.00
10/10/02	ATC	Conference with cost recovery team (1.00); review documents for responsiveness to discovery requests and privilege (5.1).	6.10	1,067.50
10/10/02	MFC	Attend training session on working with Lotus Notes and re document review/coding issues (1.00) (N/C).	0.00	0.00
10/10/02	JAH	Attend strategy meeting (1.00); conference with JDMcCarthy re ATSDR findings of fact and conclusions of law (.50).	1.50	330.00
10/10/02	MHH	Review documents for responsiveness to discovery requests and privilege.	8.80	1,540.00

November 21, 2002

W.R. Grace

Page 45
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/10/02	BCH	Review, categorize, and code documents for various case issues.	1.00	250.00
10/10/02	KAT	Review documents for responsiveness to discovery requests and privilege (2.50).	2.50	462.50
10/10/02	SBY	Review documents for responsiveness to discovery requests and privilege (4.30).	4.30	1,075.00
10/10/02	NKA	Review, categorize and code documents to be produced to EPA for relevances to document request issues (5.00); Manage and provide assistance to temporary employees and HRO employees re document review/coding issues (2.50); Attend Grace cost recovery team meeting re trial schedule, deadlines, and priorities (1.00); Office meeting with KJCoggon, JLSherman, and AECarroll re outstanding discovery issues (.30).	8.80	968.00
10/10/02	AEC	Trial team meeting re upcoming deadlines and strategy (1.00); update deposition exhibit tracking chart and notebooks, and update database to reflect previously marked exhibits (1.8); review, categorize and code documents produced by EPA for relevance to various case issues (1.5); review and compile sampling documents for R. Lee direct testimony (3.2).	7.50	937.50
10/10/02	KLK	Review progress reports from contractors and subcontractors and create timeline of activities at Libby sites (6.50).	6.50	812.50
10/10/02	JLS	Cost recovery team meeting re status of various deadlines and case issues (1.00); conferences with CCotts, NKABerle, AECarroll and KJCoggon re privilege logs (1.30); conference with CLNeitzel re deposition transcripts for Dori Kuchinsky and database research re same (0.60); review, categorize and code document for various case issues (3.40).	6.30	787.50

November 21, 2002

W.R. Grace

Page 46
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/10/02	JMH	Review progress reports from contractors and subcontractors and create timeline of activities at Libby sites.	7.80	1,092.00
10/10/02	DRD	Review, categorize and code documents produced by EPA for relevance to various case issues.	8.00	480.00
10/10/02	MBF	Review, categorize and code problem work-product/medical confidential documents to be produced to EPA for relevance to various case issues (3.60).	3.60	324.00
10/10/02	ICM	Conduct case law research for Motion in Opposition to Exclude the Expert Testimony of Dale Jensen and Motion in Opposition to Summary Judgement (4.20); conduct case law research and research citations to support specific fact statements in Statement of Material Facts re Cost recovery (2.80).	7.00	770.00
10/11/02	LB	Prepare for and meeting with Alan Stringer and Jim Stout, including site tour (5.00); travel to Libby from Kalispell (1.00) (N/C 1.00) (NWT 50%); travel from Libby to Denver (2.80) (N/C 2.80) (NWT 50%); telephone conferences with KJCoggon re site information and case issues (.40).	9.20	3,680.00
10/11/02	CGH	Conferences re administrative record briefs and citations needed for reply on depositions, review of same (1.80); review of documents, deposition transcripts in preparation for brief drafting and draft reply brief on Peronard and Weis (3.50).	5.30	1,855.00
10/11/02	KWL	Telephone conference with KJCoggon re motions, discovery issues, and schedule (.50); review EPA documents re Max Dodson and Marianne Horinko for purposes of developing trial cross-examination (1.20); telephone conference with KJCoggon re coordinating responses to US' motions (.30).	2.00	700.00

November 21, 2002

W.R. Grace

Page 47
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/11/02	LSD	Continue reviewing motion for summary judgment, including statement of facts for purposes of developing response (2.50).	2.50	750.00
10/11/02	KJC	Address inquiries and issues re document databases (0.40); review and respond to e-mail and questions re document review and coding (1.20); coordinate expert work including review and respond to e-mail and messages and telephone conferences with experts and counsel (0.20); follow up on document production from EPA (0.40); respond to questions from client and team re facts and documents (0.30); telephone conference with KWLund re U.S. motions, discovery issues and schedule (0.50); telephone conference with W. Corcoran re motions and related issues (0.30); address trial logistics re computers, staffing, space and software (1.40); address issues re production to EPA (1.80); review and respond to emails re responses to motions for summary judgment (2.30); telephone conference with R. Marriam re EPA decisions (0.10); telephone conferences with LBrown re site visit, timeline and motions (0.40); telephone conference with KLKinnear re timeline (0.30); draft e-mail re timeline (0.20); conference with MJOchs re motion to exclude R. Lee (0.20).	10.00	2,750.00
10/11/02	JD	Review documents for responsiveness to discovery requests and privilege (5.70).	5.70	1,482.00
10/11/02	EES	Complete review of Wiley Wright's deposition testimony (1.60); draft proposed findings of fact for cost issues (4.80); begin review of Timothy Wall's (CDM) deposition testimony (1.10).	7.50	2,100.00
10/11/02	CCC	Review, categorize and code documents produced by EPA for relevance to various case issues.	9.00	2,340.00

November 21, 2002

W.R. Grace

Page 48
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/11/02	GMB	Lexis research re remedy for exceptions to review limited to administrative record (3.50); review cases re remedy for exceptions to review limited to administrative record (2.80).	6.30	1,386.00
10/11/02	LAC	Review, categorize and code documents produced by EPA for relevance to various case issues.	4.00	900.00
10/11/02	ATC	Research re de novo review of administrative record for GMBarry and conclusions of law (6.4).	6.40	1,120.00
10/11/02	JAH	Consider and perform legal research re removal issues (9.20); conference with GMBarry re same (1.00).	10.20	2,244.00
10/11/02	MHH	Review documents for responsiveness to discovery requests and privilege.	7.70	1,347.50
10/11/02	KAT	Review documents for responsiveness to discovery requests and privilege (1.00).	1.00	185.00
10/11/02	SBY	Review documents for responsiveness to discovery requests and privilege (9.10).	9.10	2,275.00
10/11/02	NKA	Review, categorize and code documents to be produced to EPA for relevances to document request issues (3.80); Manage and provide substantive review re document coding issues (2.10);	5.90	649.00
10/11/02	AEC	Review and compile supplemental production documents for potential use by our experts (3.8); review, categorize and code documents produced by EPA for relevance to various case issues (4.5).	8.30	1,037.50
10/11/02	AH	Review, categorize and code documents produced by EPA for relevance to various case issues.	7.50	750.00
10/11/02	KLK	Review progress reports from contractors and subcontractors and create timeline of activities at Libby sites (8.00).	8.00	1,000.00

November 21, 2002

W.R. Grace

Page 49
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/11/02	JLS	Research for Motion for Summary Judgment re residential properties listed in Statement of Uncontroverted Facts including review of Weis, Peronard, Stringer and Owens depositions (4.20); review categorize and code documents for various case issues (2.80).	7.00	875.00
10/11/02	PRS	Conference with KJCoggon re organization of Libby, Cost Recovery and other Grace files (0.60); conference with T. Johnson re same (0.60).	1.20	150.00
10/11/02	DRD	Review, categorize and code documents produced by EPA for relevance to various case issues.	8.00	480.00
10/11/02	MBF	Review, categorize and code documents produced by EPA for relevance to various case issues (2.70); obtain cases cited in government brief at request of LSDecker (2.00).	4.70	423.00
10/12/02	MWW	Review, categorize and code documents produced by EPA for relevance to various case issues.	2.30	678.50
10/12/02	EES	Complete review of Day 1 of Timothy Wall's deposition testimony (2.30); review Day 2 of Timothy Wall's deposition testimony (2.90); begin review of Day 2 of John McGuiggan's deposition testimony (1.60).	6.80	1,904.00
10/12/02	JAH	Receive and evaluate US' motion for partial summary judgment on third defense (.50); consider and review legal research re removal issues (7.50).	8.00	1,760.00
10/12/02	MHH	Review documents for responsiveness to discovery requests and privilege.	1.80	315.00
10/12/02	NKA	Update cost recovery coding spreadsheet with contents of images from cd PMT_029 (1.70).	1.70	187.00
10/13/02	MWW	Review, categorize and code documents produced by EPA for relevance to various case issues.	8.00	2,360.00

November 21, 2002

W.R. Grace

Page 50
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/13/02	JAH	Consider and review legal research re removal issues and prepare outline of same.	7.00	1,540.00
10/13/02	MJO	Review Motion in Limine to Strike Portions of Proposed Testimony of Dr. Richard Lee as filed by EPA (with Exhibits) (.30); review deposition of Dr. Lee (1.50); retrieve and review case law cited by EPA and case law in response (Lexis) (3.20).	5.00	900.00
10/14/02	LB	Meeting with Rich Bartelt, Frank Jones, and KJCoggon (and for part also with Dale Jensen, Kurt Fessler, and EEstevenson) re preparation for testimony (7.20); conference with KJCoggon re schedule for preparation of Hughson, Chatfield, and follow up with Lee and Stringer (.30); e-mail exchange with KWLund and then conference call with KWLund and KJCoggon re November client strategy meeting (.10); office conference with CLNeitzel re findings of fact re non-cancer end points and Hughson trial preparation schedule (.50); review first draft of reply re Weis and Peronard deposition continuation and brief conference with ATCrist re same (.20).	8.30	3,320.00
10/14/02	CGH	Review of draft brief and assemble research re same in preparation for filing (.20).	0.20	70.00
10/14/02	KWL	Review deposition transcript of Harry Eschenbach for purposes of developing trial testimony (1.50); review deposition transcripts for Meeker and Millette for purpose of coordinating trial testimony (4.50).	6.00	2,100.00
10/14/02	JDM	Telephone conference with CLNeitzel re non-cancer findings of fact (0.2); telephone conference with CLNeitzel re deposition testimony as it relates to findings of fact (0.2).	0.40	120.00

November 21, 2002

W.R. Grace

Page 51
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/14/02	CLN	Review of information re liability brief (.30); review and revise findings of fact re non-pleural endpoints (2.70); memo to file re Hughson deposition (.20); review and revise Eschenbach deposition (.30); memo to file re Eschenbach deposition (1.0); review U.S. motions filed on Friday (1.0); conference with LBrown re findings of fact (.30); review and revise findings of fact (2.80); conference with H. Eschenbach (.20).	8.80	2,640.00
10/14/02	LSD	Respond to e-mail from KJCoggon re Motion for Summary Judgment and Stipulations (.20); review further documents in preparation for responding to Motion for Summary Judgment re liability and telephone conference with JLSherman re her review of pertinent deposition transcripts (.70).	0.90	270.00
10/14/02	KJC	Address inquiries and issues re document databases (0.20); review and respond to e-mail and questions re document review and coding (0.30); coordinate expert work including review and respond to e-mail and messages and telephone conferences with experts and counsel (0.20); respond to questions from client and team re facts and documents (0.40); telephone conference with G. Graham re trial logistics, options re getting the Court to respond, and various pending motions (1.20); conference with R. Bartelt, LBrown and F. Johns re trial testimony (5.40); conference with R. Bartelt, D. Jensen et al re trial testimony coordination (1.20); conferences with LBrown re expert trial testimony, reply brief, schedule and staffing (0.70).	9.60	2,640.00
10/14/02	MWW	Review, categorize and code documents produced by EPA for relevance to various case issues.	0.80	236.00

November 21, 2002

W.R. Grace

Page 52
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/14/02	EES	Review EPA's brief in support of their motion for summary judgment (3.40); draft outline of response to EPA's summary judgment motion (2.80); meet with accounting experts, cost experts, LBrown and KJCoggon re cost issues/trial strategy (1.20); review case authority for use in opposition to the government's summary judgment motion (3.20).	10.60	2,968.00
10/14/02	CCC	Review, categorize and code documents produced by EPA for relevance to various case issues.	9.00	2,340.00
10/14/02	GMB	Meeting with JAHall re Motion for Summary Judgement brief (.70); Lexis research re "arbitrary and capricious" issues for Motion for Summary Judgement brief (2.30); review Lexis research cases re same (2.80).	5.80	1,276.00
10/14/02	LAC	Review, categorize and code documents produced by EPA for relevance to various case issues.	5.70	1,282.50
10/14/02	ATC	Cite check and edit reply to U.S. opposition re deposition time limits (4.8); meet with JAHall re response to motion for summary judgement re third affirmative defense (0.5); review motion and preliminary motions (1.5).	6.80	1,190.00
10/14/02	JAH	Review legal research for response to motion for summary judgment-third defense and prepare summaries of same (5.50); telephone conference with GMBarry re preparation of response to motion for summary judgment-third defense (.70); conference with MBFloyd re top EPA NPL sites (.20); review research regarding same (.30); conference with ATCrist re response to motion for summary judgment-third defense (.50).	7.20	1,584.00
10/14/02	MHH	Review documents for responsiveness to discovery requests and privilege.	4.90	857.50
10/14/02	BCH	Review, categorize, and code documents for various case issues.	3.50	875.00

November 21, 2002

W.R. Grace

Page 53
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/14/02	DPK	Review and comment on government briefs (1.0); research summary judgment standards (1.0).	2.00	480.00
10/14/02	MJO	Begin draft response to Motion in Limine re Dr. Lee.	3.30	594.00
10/14/02	NKA	Manage and provide assistance to temporary employees and HRO personnel regarding document coding/review issues (1.00); Update coding assignment spreadsheets with new material in WRG 10 million series and Production database (.70); Phone conferences with expert and AECarroll re cd's still to be provided for review (.20); Review and revise privilege log for Alan Stringer paper documents and e-mail files (5.40).	7.30	803.00
10/14/02	AEC	Review supplemental production documents for potential use by our experts (5.2); update deposition exhibit tracking chart and notebooks, and update database to reflect previously marked exhibits (1.5).	6.70	837.50
10/14/02	AH	Review, categorize and code documents produced by EPA for relevance to various case issues.	6.10	610.00
10/14/02	KLK	Review progress reports from contractors and subcontractors and other documents to create timeline of activities at Libby sites (8.00).	8.00	1,000.00
10/14/02	JLS	Research re liability for Motion for Summary Judgment including review of expert depositions (2.40); conference with AHerceglie re database research (0.30); load Brody deposition in Livenote and send to client (0.30) (N/C); database research for LBrown re Libby property values (0.90); review categorize and code documents for various case issues (1.20).	4.80	600.00
10/14/02	DRD	Review, categorize and code documents produced by EPA for relevance to various case issues.	8.00	480.00

November 21, 2002

W.R. Grace

Page 54
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/14/02	MBF	Research and obtain EPA guidance documents for KJCoggon (1.50); research on five most contaminated NPL sites for JAHall (1.50).	3.00	270.00
10/14/02	ICM	Review and analyze issues in summary judgement motions as per EESTevenson's request.	3.20	352.00
10/15/02	LB	Conference with KJCoggon re priorities, schedule and case facts (0.80).	0.80	320.00
10/15/02	KWL	Review United States motions for Summary Judgement and Motions to Exclude for purpose of formulating strategic response (3.0); review final proposed stipulation on liability issues for purpose of considering additional proposed stipulations (1.40).	4.40	1,540.00
10/15/02	JDM	Review Middleton deposition in preparation for draft findings of fact (3.3); outline findings of fact re case series (1.7).	5.00	1,500.00
10/15/02	CLN	Review of Dahl expert report (.50); review of documents re non-cancer endpoints in connection with findings of fact and conference with Rick Reiss re same (3.30); review of asbestos documents for findings of fact in preparation for call with Rick Reiss (1.0); review of pleural plaques documents in preparation for call with Rick Reiss (1.0); telephone conference with Rick Reiss and Jay Turim re trial preparation issues (.80).	6.60	1,980.00
10/15/02	LSD	Coordinate with JAD'Alessandro re additional research issues (.30); office conference with JLSherman re findings of fact relating to Motion for Summary Judgment (.50); continue reviewing Statement of Fact and brief in support of Motion in preparation for responding to same (2.0).	2.80	840.00
10/15/02	DJB	Review, categorize and code documents produced by EPA for relevance to various case issues (6.10).	6.10	1,677.50

November 21, 2002

W.R. Grace

Page 55
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/15/02	KJC	Draft, review and edit findings of fact and conclusions of law (0.30); draft direct examination questions (0.10); address billing issues from team, vendors and experts (0.40); address inquiries and issues re document databases (0.50); review and respond to e-mail and questions re document review and coding (0.60); coordinate expert work including review and respond to e-mail and messages and telephone conferences with experts and counsel (0.30); respond to questions from client and team re facts and documents (0.20); address EPA motion in limine re R. Lee (2.40); telephone conference with A. Stringer re trial testimony (0.20); research re EPA decisions on asbestos (0.30); conference with LBrown re priorities, schedule and case facts (0.80); telephone conference with EEStevenson re schedule for responding to motion for summary judgment and motion in limine (0.30); address trial logistics (0.70); review A. Stringer documents for responsiveness and privilege (1.20); research EPA data (0.70); review EPA admissions (0.40).	9.40	2,585.00
10/15/02	JD	Conference with LSDecker re response to summary judgment motion on liability (0.30); review emails re summary judgment issues (0.20).	0.50	130.00
10/15/02	EES	Draft indirect cost portion of the findings of fact (3.80); review additional case authority re opposition to summary judgment motion (2.20); review analysis opposing the government's motion to exclude Dale Jensen's testimony (2.70); meet with accounting experts re findings of fact, cost opinion updates/revisions, and summary judgment issues (3.10).	11.80	3,304.00
10/15/02	CCC	Review, categorize and code documents produced by EPA for relevance to various case issues.	8.00	2,080.00
10/15/02	ER	Review, categorize and code documents produced by EPA for relevance to various case issues.	2.00	350.00

November 21, 2002

W.R. Grace

Page 56
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/15/02	GMB	Review of exhibits to DOJ's Motion for Summary Judgement (4.10).	4.10	902.00
10/15/02	ATC	Research re response to motion for summary judgment re third affirmative defense (4.60); conference with JAHall re organization of response (1.20).	5.80	1,015.00
10/15/02	MFC	Review, categorize and code documents produced by EPA for relevance to various case issues (4.50) (N/C).	0.00	0.00
10/15/02	JAH	Conference with ATCrist re research and strategy for response to motion for summary judgment-third defense.	1.20	264.00
10/15/02	MHH	Review documents for responsiveness to discovery requests and privilege.	3.00	525.00
10/15/02	BCH	Review, categorize, and code documents for various case issues.	9.00	2,250.00
10/15/02	DPK	Research statutes and case law re CERCLA standards for response costs recovery and re admission of expert testimony (3.0); review and comment on government briefs on motion for summary judgment and motion in limine to exclude expert testimony and conference with HRO personnel re same (3.0); review and comment on expert reports (2.0).	8.00	1,920.00
10/15/02	MJO	Begin draft of response to Motion in Limine re Dr. Lee (3.80); review pleadings and ruling from Barbanti v. Grace in Washington State re challenge to Dr. Lee's testimony (1.00).	4.80	864.00

November 21, 2002

W.R. Grace

Page 57
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/15/02	NKA	Continue to draft privilege log for Alan Stringer material in WRG 10 million series (5.30); Manage and provide assistance to temporary employees and HRO personnel re document review/coding issues (2.00); Search for and locate "clean" copies of three Action Memoranda as requested by expert (.80); Search for and locate response document per EESTevenson's request, and provide same to DPKunstle and ICMulholland (.70).	8.80	968.00
10/15/02	AEC	Review and transmit supplemental production documents for potential use by our experts (2.7).	2.70	337.50
10/15/02	AH	Review and organize W.R. Grace case file (N/C).	0.00	0.00
10/15/02	KLK	Review progress reports from contractors and subcontractors and other documents to create timeline of activities at Libby sites (10.50).	10.50	1,312.50
10/15/02	JLS	Review categorize and code documents for various case issues (2.80); research re liability for Motion for Summary Judgment including database research (3.10); conferences with CCotts re EPA Production/Cost Recovery database (1.20).	7.10	887.50
10/15/02	JMH	Review progress reports from contractors and subcontractors and create timeline of activities at Libby sites (2.00).	2.00	280.00
10/15/02	DRD	Review, categorize and code documents produced by EPA for relevance to various case issues.	8.00	480.00
10/15/02	MBF	Research EPA website for guidance documents on removal actions (.20); call EPA Superfund hotline re same (.10); review, categorize and code documents produced by EPA for relevance to various case issues (.40); research caselaw regarding section 9601(35)(C) for LSDecker (2.80).	3.50	315.00

November 21, 2002

W.R. Grace

Page 58
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/15/02	ICM	Conduct research on several legal issues to develop motions in response to DOJ motions to exclude experts and request for summary judgment.	8.00	880.00
10/16/02	KWL	Review various emails re responses to United States Summary Judgment motions (.60); telephone conference with Bill Corcoran re case status and strategy (.40); review draft findings of fact and conclusions of law for purposes of developing consistent trial strategy (2.70).	3.70	1,295.00
10/16/02	JDM	Draft findings of fact re Middleton.	1.00	300.00
10/16/02	CLN	Conference with B.Hughson re deposition (.50); review and revise Eschenbach deposition changes (.20); review Hughson changes (.30).	1.00	300.00
10/16/02	LSD	Office conference with KJCoggon re facts and strategies related to responding to Motion for Summary Judgment on liability (1.0); follow up on issues discussed as well as further review of information and brief from plaintiff (1.20).	2.20	660.00
10/16/02	DJB	Review, categorize and code documents produced by EPA for relevance to various case issues (1.80).	1.80	495.00

November 21, 2002

W.R. Grace

Page 59
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/16/02	KJC	Draft direct examination questions (1.30); address billing issues from team, vendors and experts (0.30); review and respond to e-mail and questions re document review and coding (0.10); coordinate expert work including review and respond to e-mail and messages and telephone conferences with experts and counsel (0.60); review and respond to e-mail and follow up on document production from EPA (0.30); respond to questions from client and team re facts and documents (0.10); conference with LSDecker re opposition to Motion for Summary Judgment re liability (1.10); research re opposition to Motion for Summary Judgment re liability (0.40); telephone conference with R. Lee re trial testimony (2.00); review and revise opposition to motion in limine (0.50); review, research and revise privilege log (0.50); conference with AHerceglic and TTJohnson re case status, documents and depositions (0.40); conference with GMBarry re progress on response to Motion for Summary Judgment (0.20); conference with EEStevenson re progress on response to Motion for Summary Judgment and motion in limine, findings of fact and new Jensen cost schedule (0.40).	8.20	2,255.00
10/16/02	JD	Review KDC's response to government motion for partial summary judgment on liability issue (2.00); research re passive migration theory (3.30).	5.30	1,378.00
10/16/02	EES	Revise and expand the findings of fact re direct cost documentation issues and annual allocation cost issues (4.90); extended phone conference with accounting expert re cost findings of fact issues (1.40); review documentation issues raised by Wiley Wright's new cost opinions (.80); expand Daubert brief analysis opposing the exclusion of Dale Jensen's expert testimony (2.70).	9.80	2,744.00
10/16/02	CCC	Review, categorize and code documents produced by EPA for relevance to various case issues.	9.00	2,340.00

November 21, 2002

W.R. Grace

Page 60
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/16/02	GMB	Review of previous filings dealing with lack of evidentiary support in administrative record, Bartelt report and conclusions (6.50).	6.50	1,430.00
10/16/02	ATC	Research and draft chart re response to motion for summary judgment on third affirmative defense.	6.40	1,120.00
10/16/02	MFC	Review, categorize and code documents produced by EPA for relevance to various case issues (2.80) (N/C).	0.00	0.00
10/16/02	JAH	Review of legal research re motion for summary judgment-third defense and preparation of response re same.	2.00	440.00
10/16/02	MHH	Review documents for responsiveness to discovery requests and privilege.	2.20	385.00
10/16/02	BCH	Review, categorize, and code documents for various case issues.	8.50	2,125.00
10/16/02	DPK	Research and summarize case law for summary judgment brief re response costs (1.0); draft outline of summary judgment brief (0.8); conference with HRO personnel re same (0.5).	2.30	552.00
10/16/02	MJO	Continue draft of response to Motion in Limine re Dr. Lee (3.50); draft Affidavit of Dr. Lee in support of Response to Motion in Limine (1.00); edit both response and affidavit for consistency (.80); review and incorporate language from Barbanti pleading (1.00).	6.30	1,134.00
10/16/02	NKA	Continue to draft privilege log for Alan Stringer material in WRG 10 million series (4.80); Manage and provide assistance to temporary employees and HRO personnel re document review/coding issues (1.50).	6.30	693.00

November 21, 2002

W.R. Grace

Page 61
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/16/02	AEC	Review and transmit supplemental production documents for potential use by our experts (3.3); review, categorize and code documents produced by EPA for relevance to various case issues (1.8); update deposition exhibit tracking chart and notebooks, and update database to reflect previously marked exhibits (1.5).	6.60	825.00
10/16/02	AH	Review and organize W.R. Grace case file (N/C).	0.00	0.00
10/16/02	KLK	Review progress reports from contractors and subcontractors and other documents to create timeline of activities at Libby sites (12.00).	12.00	1,500.00
10/16/02	JLS	Research re liability for Motion for Summary Judgment (4.30); database research re Libby timeline (0.90); conferences with KLKinnear re same (0.30); review categorize and code Boulder documents for various case issues (3.20).	8.70	1,087.50
10/16/02	DRD	Review, categorize and code documents produced by EPA for relevance to various case issues.	8.80	528.00
10/16/02	MBF	Research for LSDecker regarding CERCLA section 9601(35)(A) and owner/operator liability (3.70); review, categorize and code documents to be produced to EPA (2.80).	5.50	495.00
10/16/02	ICM	Conduct research on several legal issues to develop motions in response to DOJ motions to exclude experts and summary judgment.	8.00	880.00
10/17/02	KWL	Telephone conference with KJCoggon re coordination of various trial preparation issues. (N/C)	0.00	0.00

November 21, 2002

W.R. Grace

Page 62
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/17/02	CLN	Review and evaluate U.S. motions (2.0); conference with J. Flynn (.30); conference with H. Eschenbach and arrange for affidavit (.20); perform quality control check on documents (.80) (.80 N/C); finalize H. Eschenbach deposition memo and provide to D. Cameron (.20); review and revise findings of fact and conclusions of law (3.0).	5.70	1,710.00
10/17/02	LSD	Office conference with JAD'Alessandro re status of research (.30); respond to emails re strategies for additional scope of stipulation (.70); continue research and review of facts in preparation for responding to Motion for Summary Judgment on liability (2.80).	3.80	1,140.00
10/17/02	DJB	Review, categorize and code documents produced by EPA for relevance to various case issues (3.00).	3.00	825.00
10/17/02	KJC	Draft, review and edit findings of fact and conclusions of law (1.10); draft direct examination questions (0.40); review and respond to e-mail and questions re document review and coding (0.20); coordinate expert work including review and respond to e-mail and messages and telephone conferences with experts and counsel (0.70); review and respond to e-mail and follow up on document production from EPA (0.20); respond to questions from client and team re facts and documents (0.30); telephone conference with R. Lee re direct exam testimony and exhibits (2.00); draft emails to client re Motion for Summary Judgments (0.40); telephone conference with W. Corcoran re stipulation, schedule and progress (0.10); telephone conference with KWLund re status of various case projects (0.40); review Motion for Summary Judgment re liability (0.30); telephone conference with EESTevenson re Daubert and Jensen revised schedule (0.30).	6.40	1,760.00

November 21, 2002

W.R. Grace

Page 63
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/17/02	JD	Review government motion for partial summary judgment on liability issue (1.10); research re passive migration theory (8.70); research re indemnification contracts in CERCLA context (1.00).	10.80	2,808.00
10/17/02	EES	Review and revise draft findings of fact (4.60); extended phone conferences with accounting experts re findings of fact issues (1.70); review additional Daubert case authority re the admissibility of financial expert testimony (2.80).	9.10	2,548.00
10/17/02	CCC	Review, categorize and code documents produced by EPA for relevance to various case issues.	8.00	2,080.00
10/17/02	ER	Review, categorize and code documents produced by EPA for relevance to various case issues.	5.50	962.50
10/17/02	GMB	Draft outline for response to Motion for Summary Judgement (1.20); draft and edit sections re standard for review; summary or argument (3.0); additional Lexis research re "arbitrary capricious" non-environmental cases (2.20).	6.40	1,408.00
10/17/02	MFC	Review, categorize and code documents produced by EPA for relevance to various case issues (2.20) (N/C).	0.00	0.00
10/17/02	BCH	Review, categorize, and code documents for various case issues.	3.50	875.00
10/17/02	DPK	Research case law re summary judgment and accounting experts (3.0); review and summarize expert reports (3.0); draft summary judgment response brief and conference with MJOchs re same (4.5).	10.50	2,520.00

November 21, 2002

W.R. Grace

Page 64
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/17/02	MJO	Conference with DPKunstle re response to summary judgment motion dated October 11, 2002 (.50); review summary judgment pleadings and supporting documentation (1.50); review case law cited by EPA therein (.70); conference with DPKunstle re response strategy (.30); retrieve case law re summary judgment in the face of expert report (Lexis) (.60); outline response to summary judgment (2.70).	6.30	1,134.00
10/17/02	NKA	Review final draft of privilege log and prepare cd's and transmittal letter for "Second Supplemental Production in Response to US Discovery Requests" for delivery to DOJ (1.90); Prepare cd's and transmittal letter for "First and Second Supplemental Production in Response to US Discovery Requests" for mailing to D. Frost (.50); Search, locate and prepare portions of Colette Wilson testimony per ICMulholland's request (.50); Update assignment sheet with document ranges to be coded in the EPA Production database (.80); Manage and provide substantive review re document coding issues (1.50); Match bates numbers to documents pulled from Boulder and Winthrop boxes and scanned into WRG 10 million database (1.70).	6.90	759.00
10/17/02	AEC	Update deposition exhibit tracking chart and notebooks, and update database to reflect previously marked exhibits (1.5); review, categorize and code documents produce by EPA for relevance to various case issues (2.0).	3.50	437.50
10/17/02	AH	Review and organize W.R. Grace case file (N/C).	0.00	0.00
10/17/02	KLK	Review progress reports from contractors and subcontractors and other documents to create timeline of activities at Libby sites (12.00).	12.00	1,500.00
10/17/02	JLS	Research re liability for Motion for Summary Judgment (5.90).	5.90	737.50

November 21, 2002

W.R. Grace

Page 65
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/17/02	DRD	Review, categorize and code documents produced by EPA for relevance to various case issues.	7.00	420.00
10/17/02	MBF	Review, categorize and code documents to be produced to EPA for relevance to various case issues (1.00).	1.00	90.00
10/17/02	ICM	Conduct research on several legal issues to develop motions in response to DOJ motions to exclude experts and request for summary judgment.	8.00	880.00
10/18/02	KWL	Review draft stipulation re ZAI issues and Grace Conn liability (1.00).	1.00	350.00
10/18/02	CLN	Review and revise deposition summaries for file (1.80); review S.Moolgavkar deposition for purposes of findings of facts and prepare memorandum to file (4.0); review Peronard deposition to prepare for reply brief re administrative record (2.0).	7.80	2,340.00
10/18/02	LSD	Office conference with NK Aberle re questionnaires relating to Libby residents' use of vermiculite (.30); office conference with CL Rogers re scope of a range of liability (.50); begin response to Motion for Summary Judgment re liability (6.5).	7.30	2,190.00
10/18/02	DJB	Review, categorize and code documents produced by EPA for relevance to various case issues (4.00).	4.00	1,100.00

November 21, 2002

W.R. Grace

Page 66
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/18/02	KJC	Draft, review and edit findings of fact and conclusions of law (0.40); address billing issues from team, vendors and experts (0.10); address inquiries and issues re document databases (0.20); review and respond to e-mail and questions re document review and coding (0.40); coordinate expert work including review and respond to e-mail and messages and telephone conferences with experts and counsel (0.30); respond to questions from client and team re facts and documents (0.30); e-mail exchange with client re position for response to Motion for Summary Judgment liability (0.30); telephone conferences with LSDecker re opposition to Motion for Summary Judgment re liability (0.30); telephone conferences with G. Graham re schedule, Motion for Summary Judgments, findings of fact and general strategy (1.10); address trial logistics (0.30); conference with GMBarry, JAHall, ATCrist re opposition to Motion for Summary Judgment (1.10).	4.80	1,320.00
10/18/02	JD	Draft insert for response to summary judgment motion re passive migration theory (3.40); conference with LSDecker re response to summary judgment motion (0.30); research re indemnification contracts in CERCLA context (3.50).	7.20	1,872.00
10/18/02	EES	Review extensive supporting declarations and other attachments supporting EPA's summary judgment motion (3.60); review and finalize cost findings of fact (3.30).	6.90	1,932.00
10/18/02	CCC	Review, categorize and code documents produced by EPA for relevance to various case issues.	9.00	2,340.00

November 21, 2002

W.R. Grace

Page 67
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/18/02	GMB	Meeting with KJCoggon, JAHall and ATCrist re progress on Motion for Summary Judgement response and themes of Grace case (1.10); meeting with JAHall and ATCrist re responsibilities for Motion for Summary Judgement response (.60); review of DOJ's exhibits for use in factual support (4.50); draft "arbitrary and capricious" section of Motion for Summary Judgement response (2.30).	8.50	1,870.00
10/18/02	JGB	Review electronic documents for preparation of timeline for cost recovery litigation (4.20).	4.20	735.00
10/18/02	ATC	Meeting with KJCoggon and JAHall re response to motion for summary judgment (1.10); research re response to motion for summary judgment (.40).	1.50	262.50
10/18/02	JAH	Review legal for response to motion for summary judgment-third defense (1.00); conference with KJCoggon, GMBarry and ATCrist re same (1.10); conference with GMBarry and ATCrist re strategy for response (.80); conference with LSDecker re motion for summary judgment responses (.20).	3.10	682.00
10/18/02	BCH	Review, categorize, and code documents for various case issues.	3.50	875.00
10/18/02	DPK	Research statutes, regulations and case law re summary judgment motion (2.0); review expert reports and depositions and outline same (3.0); draft summary judgment response brief and conference with HRO personnel re same (3.8).	8.80	2,112.00
10/18/02	MJO	Continue outline of response to summary judgment (research, write) (.50); read expert report of Dale Jensen (2.30); conference with DPKunstle and EESTevenson re outline of response (.30); begin draft of response (4.90).	8.00	1,440.00

November 21, 2002

W.R. Grace

Page 68
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/18/02	NKA	Search EPA Production database and WRG 10 Million series database for documents to be used for preparation of response to plaintiff's motion for summary judgement (3.70); Match bates numbers to documents pulled from Boulder and Winthrop boxes and scanned into WRG 10 Million series database (1.10); Manage and provide substantive review re document coding issues (1.00).	5.80	638.00
10/18/02	AEC	Review, categorize and code documents produced by EPA for relevance to various case issues (3.5).	3.50	437.50
10/18/02	AH	Review and organize W.R. Grace case file (N/C).	0.00	0.00
10/18/02	KLK	Review progress reports from contractors and subcontractors and other documents to create timeline of activities at Libby sites (10.50).	10.50	1,312.50
10/18/02	JLS	Research re Libby timeline (4.80); create work folders for coders for same (0.40); telephone conferences with John Griffin and AECarroll re Peronard exhibits (0.30); telephone conferences with KJCoggon and KLKinnear re Grace timeline (0.90).	6.40	800.00
10/18/02	JMH	Review progress reports from contractors and subcontractors and create timeline of activities at Libby sites.	5.80	812.00
10/18/02	DRD	Review, categorize and code documents produced by EPA for relevance to various case issues.	7.00	420.00
10/18/02	MBF	Review, categorize and code documents to be produced to EPA for relevance to various case issues (.60).	0.60	54.00
10/19/02	LSD	Draft Motion for Summary Judgment response (1.80).	1.80	540.00
10/19/02	DJB	Review, categorize and code documents produced by EPA for relevance to various case issues (6.00).	6.00	1,650.00

November 21, 2002

W.R. Grace

Page 69
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/19/02	JD	Research re indemnification contracts in CERCLA context (6.10); draft insert for response to summary judgment motion re same (2.70).	8.80	2,288.00
10/19/02	EES	Review draft cost summary judgment opposition brief (2.20); draft comments and outline of additional analysis re the government's Daubert brief (1.90); review additional findings of fact (1.20).	5.30	1,484.00
10/19/02	JAH	Consider and prepare findings of fact and conclusions of law for ATSDR issues.	3.00	660.00
10/19/02	DPK	Draft summary judgment response brief and review related case law and exhibits (1.80).	1.80	432.00
10/19/02	KLK	Review progress reports from contractors and subcontractors and other documents to create timeline of activities at Libby sites (2.50).	2.50	312.50
10/20/02	LSD	Respond to Motion for Summary Judgment re liability.	6.30	1,890.00
10/20/02	DJB	Review, categorize and code documents produced by EPA for relevance to various case issues (5.50).	5.50	1,512.50
10/20/02	ATC	Research cases and deposition testimony re response to motion for summary judgment (3.1).	3.10	542.50
10/20/02	DPK	Review and revise summary judgment response brief (3.8); research and review related statutes, case law, expert reports and exhibits (3.0).	6.80	1,632.00
10/20/02	MJO	Review comments from EESTevenson re response to summary judgment (.20); continue draft of response to summary judgment (4.60).	4.80	864.00
10/20/02	CLR	Case research re arranger liability (4.50).	4.50	1,012.50

November 21, 2002

W.R. Grace

Page 70
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/21/02	LB	Telephone conference with KWLund re case issues (.20); e-mail exchange with CLNeitzel re Hughson preparation for trial testimony (.10).	0.30	120.00
10/21/02	KWL	Telephone conference with LBrown re trial strategy issues.	0.20	70.00
10/21/02	CLN	Review U.S. response to Quivik motion (.30); arrange for meeting with B.Hughson and coordinate with R.Senffleben and LBrown (.20); review Peronard deposition transcript for Genuine Issues for Selection of Remedy Brief and draft memo to file (6.30)	6.80	2,040.00
10/21/02	LSD	Draft and revise Motion for Summary Judgment and additional research re Statement of Facts.	3.80	1,140.00
10/21/02	DJB	Review, categorize and code documents produced by EPA for relevance to various case issues (5.80).	5.80	1,595.00
10/21/02	JD	Review cases re indemnification agreements in CERCLA context (0.50).	0.50	130.00
10/21/02	EES	Review additional supporting declarations and exhibits submitted by EPA in support of its Daubert and summary judgment briefs re costs (2.50); review additional case authority re admissibility of accounting expert testimony involving "legal" issues (2.80); review revised cost schedules prepared by accounting experts (1.10); phone conferences with accounting experts re revised cost documents and updated schedules (1.70).	8.10	2,268.00
10/21/02	CCC	Review, categorize and code documents produced by EPA for relevance to various case issues.	8.50	2,210.00
10/21/02	ER	Review, categorize and code documents produced by EPA for relevance to various case issues.	2.50	437.50

November 21, 2002

W.R. Grace

Page 71
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/21/02	GMB	Continue Lexis research on issues for Response to Motion for Summary Judgement on 3rd Affirmative Defense (2.40); continue Admin Record research on issues for Response to Motion for Summary Judgement on 3rd Affirmative Defense (3.50).	5.90	1,298.00
10/21/02	JGB	Review electronic documents in connection with timeline on cost recovery issues (3.00).	3.00	525.00
10/21/02	ATC	Draft response to motion for summary judgment re third affirmative defense -- remedial v. removal action.	7.90	1,382.50
10/21/02	IAH	Prepare findings of fact and conclusions of law for ATSDR issues (2.80); review U. S. motion for summary judgment-third defense and attachments (.50); review U. S. statement of facts and related documents (.50).	3.80	836.00
10/21/02	DPK	Draft response costs summary judgment brief (5.0); review and comment on related expert reports (3.0); research and review case law (3.0); conference with ATCrist re summary judgment brief (1.0).	12.00	2,880.00
10/21/02	MJO	Continue draft of response to summary judgment; research summary judgment issues as they related to expert testimony (Lexis).	10.00	1,800.00
10/21/02	CLR	Case research regarding arranger liability (8.50); draft section of Motion for Summary Judgement brief re same (2.30).	10.80	2,430.00
10/21/02	NKA	Search for and locate action memorandum in Production database and transmit same to cost expert (.40); manage and provide substantive review re document coding issues (.50).	0.90	99.00
10/21/02	DRD	Review, categorize and code documents produced by EPA for relevance to various case issues.	4.00	240.00

November 21, 2002

W.R. Grace

Page 72
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/21/02	LAM	Review, categorize and code documents produced by EPA for relevance to various case issues.	4.00	240.00
10/21/02	LCS	Review, categorize and code documents for relevance to various case issues	8.00	680.00
10/21/02	ICM	Conduct legal research on developing legal issues for motions (3.00); conduct research on issues of material fact (2.50); search for statements to support assertions made in briefs (1.00).	6.50	715.00
10/22/02	LB	Review photo CDs from URS (1.50); travel from Denver to Washington, D.C. for meeting with Betty Anderson (.80) (N/C .80) (NWT 50%).	2.30	920.00
10/22/02	KWL	Review and revise portions of statements of fact in support of Response to Summary Judgment Motions.	7.00	2,450.00
10/22/02	JDM	Conference with JAHall re findings of fact and conclusions of law for ATSDR (0.2); conference with EESTevenson re cost accounting findings of fact (0.2).	0.40	120.00
10/22/02	CLN	Review Peronard deposition to prepare for administrative record brief reply (2.00); review and revise Genuine Issues for Selection of Remedy Brief (.30); review U.S. response to Grace motion re administrative record (1.0); review and revise selection of remedy response brief (5.70).	9.00	2,700.00
10/22/02	LSD	Draft and revise Motion for Summary Judgment and Statement of Facts.	9.20	2,760.00

November 21, 2002

W.R. Grace

Page 73
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/22/02	KJC	Address inquiries and issues re document databases (0.10); coordinate expert work including review and respond to e-mail and messages and telephone conferences with experts and counsel (0.20); review and respond to e-mail and follow up on document production from EPA (0.20); respond to questions from client and team re facts and documents (0.30); telephone conference with LSDecker re response to Motion for Summary Judgment on liability (0.50); research and draft insert to response to Motion for Summary Judgment on liability (0.60); review CAG meeting minutes (0.30); address questions re responses to Motion for Summary Judgments (1.80); telephone conference with LBrown re schedule, Motion for Summary Judgments and findings of fact (0.40); address trial logistics (0.80); review and revise opposition to motion in limine (2.20).	7.40	2,035.00
10/22/02	EES	Expand and revise summary judgment/expert testimony admissibility analysis for use in opposition brief (3.30); complete review of cases cited by EPA in support of its summary judgment and Daubert briefs re costs (2.90); extended conference calls with accounting experts re exhibits and declaration issues (1.40); expand Daubert brief opposition analysis outline (1.80).	9.40	2,632.00
10/22/02	CCC	Review, categorize and code documents produced by EPA for relevance to various case issues.	9.00	2,340.00
10/22/02	GMB	Continue Admin Record research on issues for Response to Motion for Summary Judgement on 3rd Affirmative Defense (4.60).	4.60	1,012.00
10/22/02	ATC	Revise response to motion for summary judgment (2.0); research administrative record for statement of facts for response to motion for summary judgment re third affirmative defense (8.2).	10.20	1,785.00

November 21, 2002

W.R. Grace

Page 74
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/22/02	JDH	Review, categorize and code documents produced by EPA for relevance to various case issues (2.80) (N/C).	0.00	0.00
10/22/02	JAH	Review of prior motions re KDC claims and responses (.50); consider and prepare statement of genuine issues in support of response to U. S. motion for summary judgment-third defense (1.00); consider and prepare facts and conclusions re ATSDR (1.30); conference with ATCrist re response to U. S. motion for summary judgment-third defense (.50); review of legislative history and other research in support of response to U. S. motion for summary judgment-third defense (.80); strategy conference re responses to motions with EESTevenson, LSDecker and ATCrist (1.00); consider and draft response to U. S. motion for summary judgment-third defense (5.80).	10.90	2,398.00
10/22/02	MHH	Review documents for responsiveness to discovery requests and privilege.	3.80	665.00
10/22/02	DPK	Review and revise response costs summary judgment brief (1.5); draft Statement of Genuine Issues re response costs (1.8); conference with EESTevenson re same (0.5).	3.80	912.00
10/22/02	MJO	Edit response to opposition brief for review by EESTevenson.	2.30	414.00
10/22/02	CLR	Draft and revise section of Motion for Summary Judgement brief re arranger liability.	2.80	630.00
10/22/02	JLS	Telephone conferences with KJCoggon re trial requirements in Missoula including space issues (0.20).	0.20	25.00
10/22/02	ICM	Conduct research on issues of material fact (3.50); search for statements to support assertions made in briefs (3.00); begin cite check of brief and statement of material facts (.50).	7.00	770.00
10/23/02	LB	Work with Betty Anderson and her staff re preparation for trial (8.10); followup work re same (.50)	8.60	3,440.00

November 21, 2002

W.R. Grace

Page 75
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/23/02	CGH	Confer with CLNeitzel re her requests for documents not in administrative record re opposition to motion and review of records from deposition preparation in response to same (1.30); review of site chronology and Peronard documents for potential inclusion into timeline and select same and write notes for same for use by JMHoward (1.30); draft e-mail re Rainy Road issue and timeline review re same (.40).	3.00	1,050.00
10/23/02	KWL	Review and revise portions of Statements of Fact in support of Response to Summary Judgment Motions (4.00); review draft response to NCP Summary Judgment motion (2.80); telephone conference with KJCoggon re work coordination and strategy (.30) (.30 N/C).	6.80	2,380.00
10/23/02	JDM	Exchange e-mails re ATSDR issues and review CAG minutes (0.3); review final ZAI motion (0.4); telephone conference with J. Freeman re ZAI motion (0.2).	0.90	270.00
10/23/02	LSD	Draft and revise Motion for Summary Judgment and Statement of Facts.	10.50	3,150.00

November 21, 2002

W.R. Grace

Page 76
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/23/02	KJC	Draft, review and edit findings of fact and conclusions of law (0.30); address billing issues from team, vendors and experts (0.30); coordinate expert work including review and respond to e-mail and messages and telephone conferences with experts and counsel (0.30); respond to questions from client and team re facts and documents to support responses to motion for summary judgment (2.50); telephone conference with W. Corcoran re stipulation and strategy meeting (0.10); research re responses to motion for summary judgment (0.30); telephone conference with KWLund status of case projects and trial logistics (0.30); telephone conferences with LBrown re responses to motion for summary judgment (0.30); revise stipulation re liability (0.40); telephone conference with R. Lee re expert testimony (1.0); address trial logistics including options for trial presentation expert (0.40); telephone conference with J. Freeman re stipulation and discovery (0.30).	6.50	1,787.50
10/23/02	EES	Revise and expand draft opposition brief to EPA's motion for summary judgment re costs (6.40); review draft declaration in support of cost opposition brief (1.10); review draft statement of disputed facts re cost summary judgment brief (1.60); review draft Daubert brief re Dale Jensen's expert opinions (2.30).	11.40	3,192.00
10/23/02	CCC	Review, categorize and code documents produced by EPA for relevance to various case issues.	8.50	2,210.00
10/23/02	ER	Review, categorize and code documents produced by EPA for relevance to various case issues.	8.00	1,400.00

November 21, 2002

W.R. Grace

Page 77
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/23/02	GMB	Continue Lexis research on issues for Response to Motion for Summary Judgement on 3rd Affirmative Defense (2.0); continue Administrative Record research on issues for Response to Motion for Summary Judgement on 3rd Affirmative Defense (4.80); draft brief in response to Motion for Summary Judgement on 3rd Affirmative Defense (4.00); drafting session and conference with JAHall and ATCrist re U. S. motion for summary judgment-third defense (2.50); conference with JAHall re brief (.50).	13.80	3,036.00
10/23/02	ATC	Research re administrative record for response to motion for summary judgment re third affirmative defense (6.80); draft statement of facts re motion for summary judgment re third affirmative defense (4.10); drafting session and conference with JAHall and GMBarry re U. S. motion for summary judgment-third defense (2.50).	13.40	2,345.00
10/23/02	JAH	Consider and draft response to U. S. motion for summary judgment-third defense (12.50); conference with KJCoggon re same (.50); drafting session and conference with GMBarry and ATCrist re same (2.50).	15.50	3,410.00
10/23/02	DPK	Draft Grace Statement of Genuine Issues re response costs summary judgment motion (3.5); review expert reports and declarations (1.5); research factual sources (0.5); conference with EEStevenson re same (0.5).	6.00	1,440.00
10/23/02	MJO	Review Motion to Exclude Testimony and Report of Dale Jensen with exhibits (1.60); review response outline prepared by EEStevenson (.80); begin draft of Response to Motion to exclude Jensen (7.40).	9.80	1,764.00
10/23/02	CLR	Revise arranger liability section of Motion for Summary Judgement brief.	5.00	1,125.00

November 21, 2002

W.R. Grace

Page 78
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/23/02	NKA	Research Charles Young deposition transcript per ICMulholland's request (2.00); Search for and locate export plant ownership documentation per LSDecker's request (1.40).	3.40	374.00
10/23/02	JLS	Telephone conferences with Angela Anderson and KJCoggon re repository documents for the cost recovery case (0.30); prepare e-mails re same (0.40); conferences with LCStreet re Boulder cost recovery documents (0.40).	1.10	137.50
10/23/02	LCS	Review, categorize and code documents for relevance to various case issues	3.50	297.50
10/23/02	ICM	Cite check brief and statement of material facts (3.50); work with expert to draft declaration (4.50).	8.00	880.00
10/24/02	LB	Meeting with Betty Anderson and her staff re preparation for trial testimony (8.90); exchange e-mails with KJCoggon re summary judgment opposition briefs - status and issues (.20); telephone conference with JLSherman re document issues (.10).	9.20	3,680.00
10/24/02	CGH	Review of e-mails re motion and fact issues.	0.60	210.00
10/24/02	KWL	Review and revise draft response to Motion in Limine on R. Lee (4.00); review draft statement of facts on selection of remedy brief (2.00).	6.00	2,100.00
10/24/02	LSD	Draft and revise Motion for Summary Judgment and Statement of Facts.	10.80	3,240.00
10/24/02	DJB	Review, categorize and code documents produced by EPA for relevance to various case issues (4.30).	4.30	1,182.50

November 21, 2002

W.R. Grace

Page 79
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/24/02	KJC	Address billing issues from team, vendors and experts (0.10); coordinate expert work including review and respond to e-mail and messages and telephone conferences with experts and counsel (0.10); review and respond to e-mail and follow up on document production from EPA (0.20); respond to questions from client and team re facts and documents in support of responses to Motion for Summary Judgments (1.00); review Motion for Summary Judgment re selection of remedy and research factual bases for response (2.40); coordinate efforts to resolve data for Libby site (1.30); telephone conferences with R. Finke and D. Van Orden re data issues (1.70); review and revise opposition to RJ Lee Motion in limine (0.80); telephone conference with KWLund re oppositions to Motion for Summary Judgments and schedule (0.20).	7.80	2,145.00
10/24/02	EES	Complete revisions for draft summary judgment opposition brief regarding costs (4.90); revise draft "legal opinions" section of opposition to Daubert brief re Dale Jensen's testimony (2.80); revise factual analysis for opposition to EPA's Daubert brief re Dale Jensen's testimony (3.90); phone conferences with accounting experts re documentation issues (1.10).	12.70	3,556.00
10/24/02	CCC	Review, categorize and code documents produced by EPA for relevance to various case issues.	9.00	2,340.00
10/24/02	ER	Review, categorize and code documents produced by EPA for relevance to various case issues.	6.00	1,050.00

November 21, 2002

W.R. Grace

Page 80
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/24/02	GMB	Continue drafting and editing brief in response to Motion for Summary Judgement on 3rd Affirmative Defense (4.80); continue Lexis research on issues for Response to Motion for Summary Judgement on 3rd Affirmative Defense (1.80); continue Admin Record research on issues for Response to Motion for Summary Judgement on 3rd Affirmative Defense (2.30).	8.90	1,958.00
10/24/02	JGB	Review electronic documents in connection with timeline on cost-recovery issues (.90)	0.90	157.50
10/24/02	ATC	Revise statement of facts for response to motion for summary judgment re third affirmative defense.	6.30	1,102.50
10/24/02	JDH	Review, categorize and code documents produced by EPA for relevance to various case issues (3.30) (N/C).	0.00	0.00
10/24/02	JAH	Revise response to motion for summary judgment-third defense (3.00); conference with ATCrist re statement of facts in support of motion for summary judgment-third defense (.30); consider and prepare same (1.80); consider and prepare findings of fact and conclusions re ATSDR (1.50).	6.60	1,452.00
10/24/02	DPK	Review and revise Grace Statement of Genuine Issues re response costs summary judgment motion (5.0); review related expert reports, declarations, depositions and briefs (2.0); evidence research for EEStevenson (2.0); conference with EEStevenson re same (0.5).	9.50	2,280.00
10/24/02	MJO	Edit draft response to motion to exclude report and testimony of Jensen (2.50); retrieve and review case law in support of arguments (Lexis) (.90); review and edit response to summary judgment motion on costs following review by EEStevenson (1.20); conference with EEStevenson re additional case law required in support of Jensen Daubert response (.40); retrieve and review case law (Lexis) (1.30).	6.30	1,134.00

November 21, 2002

W.R. Grace

Page 81
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/24/02	NKA	Research database and locate screening plant documentation per LSDecker's request (.70); research Rich Lee Expert Report for references and search administrative record for same (1.10).	1.80	198.00
10/24/02	AEC	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (2.0).	2.00	250.00
10/24/02	JLS	Research for summary judgment motions (3.40).	3.40	425.00
10/24/02	JMH	Review progress reports from contractors and subcontractors and create timeline of activities at Libby sites (1.00).	1.00	140.00
10/24/02	DRD	Review, categorize and code documents produced by EPA for relevance to various case issues.	4.30	258.00
10/24/02	LAM	Review, categorize and code documents produced by EPA for relevance to various case issues.	4.00	240.00
10/24/02	LCS	Review, categorize and code documents for relevance to various case issues	7.00	595.00
10/24/02	MBF	Begin cite-check of response to motion for partial summary judgment on response costs (1.00).	1.00	90.00
10/24/02	ICM	Review and cross reference briefs (3.00); search for exhibits (1.00); conduct research to support assertions made in briefs (2.50).	6.50	715.00
10/25/02	KWL	Review and revise R.J. Lee Motion (1.20); conference with KJCoggon re same (.40).	1.60	560.00
10/25/02	LSD	Draft and revise Statement of Facts and Motion for Summary Judgment.	15.50	4,650.00
10/25/02	DJB	Review, categorize and code documents produced by EPA for relevance to various case issues (7.80).	7.80	2,145.00

November 21, 2002

W.R. Grace

Page 82
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/25/02	KJC	Address billing issues from team, vendors and experts (0.20); address inquiries and issues re document databases (0.10); respond to questions from client and team re facts and documents (0.50); coordinate expert work including review and respond to e-mail and messages and telephone conferences with experts and counsel (0.30); address trial logistics and issues (0.70); review, revise and discuss changes with author re Lee motion in limine (0.70); conferences with KWLund re status of opposition briefs and trial logistics (0.40); coordinate Motion for Summary Judgement response efforts (1.30); review cost Motion for Summary Judgement opposition and forward to client (1.30); conference with EEStevenson re comments on cost Motion for Summary Judgement response and Jensen motion in limine (0.40); conferences with paralegal team re data organization task (0.80).	6.70	1,842.50
10/25/02	EES	Meet with accounting experts re cost summary judgment opposition brief and supporting declarations (1.90); revise and expand analysis of requirements of generally accepted accounting practices for use in the Daubert opposition brief re Dale Jensen's expert testimony (3.80); review potential excerpts for opposition brief (2.10).	7.80	2,184.00
10/25/02	ER	Review, categorize and code documents produced by EPA for relevance to various case issues.	7.00	1,225.00
10/25/02	GMB	Continue drafting and editing brief in response to Motion for Summary Judgement on 3rd Affirmative Defense (2.60); continue Lexis research on issues for Response to Motion for Summary Judgement on 3rd Affirmative Defense (.70); continue Admin Record research on issues for Response to Motion for Summary Judgement on 3rd Affirmative Defense (2.0).	5.30	1,166.00

November 21, 2002

W.R. Grace

Page 83
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/25/02	JGB	Review electronic documents in connection with the creation of a timeline (1.40).	1.40	245.00
10/25/02	ATC	Meet with CLNeitzel and JAHall re statement of genuine issues for response re third affirmative defense.	0.30	52.50
10/25/02	JAH	Telephone conference with JLSherman re privilege log review; consider and revise same (.70); telephone conference with LSDecker re issues relating to response to motion for summary judgment-liability (.30); perform legal research for motion for summary judgment-liability (4.00); conference with LSDecker re same (.50); review discovery depositions for preparation of statement of facts in support of motion for summary judgment-third defense (2.50); conference with ATCrist and CLNeitzel re preparation of statement of facts in support of motion for summary judgment-third defense (.50).	8.50	1,870.00
10/25/02	BCH	Review, categorize, and code documents for various case issues.	6.50	1,625.00
10/25/02	DPK	Evidence research for EEStevenson (1.8); conference with EEStevenson re same (0.5).	2.30	552.00
10/25/02	MJO	Respond to requests by EEStevenson for case law information (retrieve and review case law for inclusion in Jensen Daubert response).	1.50	270.00
10/25/02	NKA	Manage and provide substantive review re document coding issues (.90); locate action memoranda material per LSDecker's request (.20); review and sort related data re AOC's in Libby (5.30).	6.40	704.00
10/25/02	CKA	Review and organize data re EPA sampling in Libby to support statement of facts and expert review.	1.00	125.00

November 21, 2002

W.R. Grace

Page 84
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/25/02	MCL	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (7.00).	7.00	875.00
10/25/02	JLS	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (5.80).	5.80	725.00
10/25/02	PRS	Review and organize data re EPA sampling in Libby to support statement of facts and expert review.	4.90	612.50
10/25/02	DRD	Review, categorize and code documents produced by EPA for relevance to various case issues.	8.00	480.00
10/25/02	LAM	Review, categorize and code documents produced by EPA for relevance to various case issues.	7.10	426.00
10/25/02	LCS	Review, categorize and code documents for relevance to various case issues (6.00).	6.00	510.00
10/25/02	MBF	Cite-check and assist with revisions to Memorandum in Opposition to Summary Judgment regarding costs (4.60); and cite-check and assist with revisions regarding Memorandum in Opposition to Motion in Limine regarding Dale Jensen testimony (3.40).	8.00	720.00
10/26/02	KWL	Telephone conference with KJCoggon re coordination of summary judgment response briefs.	0.30	105.00
10/26/02	JDM	Telephone conference with CLNeitzel re summary judgment brief.	0.20	60.00
10/26/02	LSD	Continue drafting and revising Statement of Facts and Motion for Summary Judgment.	15.30	4,590.00
10/26/02	DJB	Review, categorize and code documents produced by EPA for relevance to various case issues (4.00)	4.00	1,100.00

November 21, 2002

W.R. Grace

Page 85
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/26/02	KJC	Review, revise and discuss changes with authors re selection of remedy Motion for Summary Judgement (3.40); telephone conference with KWLund re status of opposition briefs (0.30).	3.70	1,017.50
10/26/02	MWW	Review, categorize and code documents produced by EPA for relevance to various case issues (7.30).	7.30	2,153.50
10/26/02	EES	Revise and finalize draft for circulation of the Daubert opposition brief re Dale Jensen's accounting testimony.	2.40	672.00
10/26/02	GMB	Continue drafting and editing brief in response to Motion for Summary Judgement on 3rd Affirmative Defense (5.80).	5.80	1,276.00
10/26/02	JAH	Consider and prepare statement of facts in support of motion for summary judgment-third defense (3.00); conference with CLNeitzel re same (.20); conference with EEStevenson re cost schedules (.20); review discovery materials for statement of facts in support of motion for summary judgment-third defense (5.30); consider and review documents relating to motion to re-open administrative record and U. S. response to same (.80); conference with CLNeitzel re same (.10); telephone conference with GMBarry re same (.10).	9.70	2,134.00
10/26/02	MJO	Review and revise response to Motion to Exclude Jensen following edits by EEStevenson (1.30); review and revise draft response to Motion to Exclude portions of Dr. Lee's testimony following edits by KJCoggon (1.70).	3.00	540.00
10/26/02	NKA	Review and compile information related to data for the AOC's in Libby, including field data sheet, chains of custody, and count sheets (6.80).	6.80	748.00
10/26/02	DD	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (6.0).	6.00	660.00

November 21, 2002

W.R. Grace

Page 86
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/26/02	MCL	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (8.60).	8.60	1,075.00
10/26/02	LAM	Review and organize data re EPA sampling in Libby to support statement of facts and expert review.	8.30	498.00
10/26/02	FP	Review and organize data re EPA sampling in Libby to support statement of facts and expert review.	4.50	315.00
10/26/02	MBF	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (1.00); cite-check and help with revisions of Opposition to Motion in Limine regarding Dale Jensen testimony (4.90).	5.90	531.00
10/27/02	KWL	Review response to selection of remedy summary judgment motion and statement of genuine issues of fact (3.70); conference with LSDecker re same (.50); conference with KJCoggon re opposition briefs (.30).	4.50	1,575.00
10/27/02	JDM	Review draft response to motion for summary judgment and provide comments.	0.50	150.00
10/27/02	LSD	Continue drafting and revising Motion for Summary Judgment and Statement of Facts re liability on First and Fourth Affirmative Defenses.	12.70	3,810.00
10/27/02	DJB	Review, categorize and code documents produced by EPA for relevance to various case issues (1.50).	1.50	412.50
10/27/02	KJC	Review and revise liability Motion for Summary Judgement response and research re factual support (3.30); telephone conference with LSDecker re liability Motion for Summary Judgement (1.90); conference with KWLund re opposition briefs (0.30); address questions and issues re data organization task (0.40); revise RJ Lee motion in limine response (1.20); coordinate Motion for Summary Judgement and motions in limine responses (0.30).	7.40	2,035.00

November 21, 2002

W.R. Grace

Page 87
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/27/02	MWW	Review, categorize and code documents produced by EPA for relevance to various case issues (7.80).	7.80	2,301.00
10/27/02	ER	Review and organize data re EPA sampling in Libby to support statement of facts and expert review.	5.50	962.50
10/27/02	GMB	Continue drafting and editing brief in response to Motion for Summary Judgement on 3rd Affirmative Defense (7.40); continue Administrative Record research on issues for Response to Motion for Summary Judgement on 3rd Affirmative Defense (2.40); meeting with JAHall re brief (1.00).	10.80	2,376.00
10/27/02	JAH	Consider and prepare revisions to response to motion for summary judgment-third defense (11.00); conference with GMBarry re same (1.00); consider and prepare revisions to statement of facts in support of motion for summary judgment-third defense (1.50).	13.50	2,970.00
10/27/02	DD	Review and organize data re EPA sampling in Libby to support statement of facts and expert review.	6.20	682.00
10/27/02	JLS	Research for summary judgment motion on liability (4.50); review and organize data re EPA sampling in Libby to support statement of facts and expert review (4.70).	9.20	1,150.00
10/27/02	PRS	Review and organize data re EPA sampling in Libby to support statement of facts and expert review.	6.50	812.50
10/27/02	FP	Review and organize data re EPA sampling in Libby to support statement of facts and expert review.	5.50	385.00
10/27/02	MBF	Review and organize data re EPA sampling in Libby to support statement of facts and expert review (6.30).	6.30	567.00

November 21, 2002

W.R. Grace

Page 88
 Invoice No.: 613444
 Client No.: 04339
 Matter No.: 00302

Itemized Services

Date	Tkpr Task	Description	Hours	Value
10/28/02	LB	Meeting with KJCoggon re status of each Response (.20); review Liability Response draft and meeting with LSDecker and KJCoggon re comments re same (.70); work on Response to U.S. Motion re Third Defense (NCP Inconsistency/Remedy Selection) (5.40); meeting with KJCoggon re same (1.00)	7.30	2,920.00
10/28/02	KWL	Review and revise summary judgment response briefs (2.00); review and revise statement of facts in support of response briefs (1.00); review and revise response to motion regarding administrative record re-opening (3.00)	6.00	2,100.00
10/28/02	JDM	Telephone conference with J. Freeman re pre-trial order.	0.10	30.00
10/28/02	LSD	Continue drafting and revising Statement of Facts and Motion for Summary Judgment re liability and the First and Fourth Affirmative Defenses.	12.40	3,720.00
10/28/02	KJC	Address inquiries and issues re document databases (0.10); respond to questions from client and team re facts and documents (0.90); address trial logistics and issues (0.20); conference with LBrown, GMBarry, JAHall, ATCrist re remedy selection Motion for Summary Judgement (1.00); research factual support for oppositions to MSJs (2.00); conferences with EESTevenson, LBrown, JAHall, LSDecker, GMBarry and ATCrist re additional revisions to Motion for Summary Judgement responses and support for genuine issues of material facts (1.80); telephone conference with G. Graham re oppositions to Motions for Summary Judgment (0.40); revise opposition to motion in limine re R. Lee (0.30); address issues re data organization project (1.20); review Motion for Summary Judgement oppositions and comment on same (1.60).	9.50	2,612.50